REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s)   Raul A. Hoare _____   Case No. __16-25461_____   Chapter __13_____

All Cases: Moving Creditor   Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing under the laws of the United States of America   Date Case Filed   8/8/2016

Nature of Relief Sought: ■ Lift Stay   □ Annul Stay   ■ Other (describe) _____

Chapter 13:   Date of Confirmation Hearing   10/3/2016   Or Date Plan Confirmed _____

Chapter 7:   □ No-Asset Report Filed on   _____

□ No-Asset Report not filed, Date of Creditors Meeting   _____

1.   Collateral
a.   ■ Home
b.   □ Car Year, Make, and Model   _____
c.   □ Other (describe)   _____

2.   Balanced Owed as of Date Judgment was entered $177,388.74 principal balance, $237,205.19 payoff balance
Total of all other Liens against Collateral $ _____

3.   In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:
_____

4.   Estimated Value of Collateral (must be supplied in *all* cases) $154,700.00.

5.   Default
a.   □ Pre-Petition Default
Number of months _____   Amount $ _____
b.   □ Post-Petition Default
i.   □ On direct payments to the moving creditor
Number of months _____   Amount $ _____
ii.   □ On payments to the Standing Chapter 13 Trustee
Number of Months _____   Amount $ _____

6.   Other Allegations
a.   □ Lack of Adequate Protection § 362(d)(1)
i.   □ No insurance
ii.   □ Taxes unpaid   Amount $ _____
iii.   □ Rapidly depreciating asset
iv.   □ Other (describe)   _____

b.   □ No Equity and not Necessary for an Effective reorganization § 362(d)(2)

c.   □ Other "Cause" § 362(d)(1)
i.   □ Bad Faith (describe)   _____
ii.   □ Multiple Filings
iii.   ■ Other (describe)   Property sold prior to this case being filed and as such Colon v. Option One Mortg. Corp., 319 F.3d 912 (7th Cir. Ill. 2003) is applicable

d.   Debtor's Statement of Intention regarding the Collateral
i.   □ Reaffirm   ii.   □ Redeem   iii.   □ Surrender   iv.   □ No Statement of Intention Filed

Date: 8/26/2016 _____   /s/ Rocio Herrera _____
Counsel for Movant